

# Robert W. Seiden

Court-Appointed Temporary Receiver for Link Motion Inc.  
Pursuant to The Honorable Judge Victor Marrero of the  
United States District Court, Southern District of New York

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## VIA ECF

Hon. Victor Marrero  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

May 18, 2023

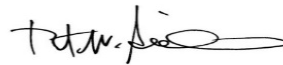
Re: *Baliga, et al. v. Link Motion Inc., et al.*, 1:18-cv-11642-VM-VF

Dear Judge Marrero,

I write to provide the Court with a further status update in connection with Link Motion Inc.'s ("LKM") extraordinary general meeting ("EGM").

In my May 9, 2023 letter (ECF 416), I indicated that in light of Mr. Lilin "Francis" Guo's ("Mr. Guo") reappearance, I would reconvene LKM's EGM consistent with the Court's prior directives.<sup>1</sup> On May 10, 2023, the Court issued an Order reaffirming that "the Receiver maintains the authority to convene an [EGM]" if "(1) [Mr. Guo] appears at the EGM; and (2) [the EGM] is convened prior to the Receiver's discharge." (ECF 417; the "EGM Order"). Mr. Guo requested the Receiver to reconvene the EGM and confirmed that he would attend the EGM. Accordingly, beginning on May 17, 2023, the Receiver, through its Cayman Islands counsel, KSG Attorneys at Law, sent notices of the EGM to LKM's shareholders in accordance with LKM's bylaws.

Please do not hesitate to contact me via email or telephone if you Honor wishes to discuss this matter in more detail.



Robert W. Seiden, Esq.  
Court-Appointed Temporary Receiver for Link  
Motion Inc.

cc: All Parties (via ECF)

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<sup>1</sup> See ECF 338, at 13 ("The extraordinary general meetings sought to be convened by [Receiver] shall be postponed until [Mr. Guo] can attend the meetings, provided that Guo reappears prior to the full discharged of the Receiver's authority, following its provision of a full accounting of the receivership's activities."); ECF 364 at 14-15 ("[The] Receiver maintains the authority to convene the extraordinary general meetings [] and may do so provided that [Mr. Guo] reappears and is able to attend the EGMs, and the EGMs are convened prior to the Court's approval of the Receiver's accounting, which results in the Receiver's discharge. ECF 364, at 14-15.").